

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	: CRIMINAL NO. _____
v.	: DATE FILED: _____
	:
SONIA I. MEDINA	: VIOLATION: 18 U.S.C. § 924(a)(1)(A)(False
	: Statements-1 Count, 5
	: Firearms)
	: Notice of Forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

AT ALL TIMES MATERIAL TO THIS INFORMATION:

1. Army and Navy Store (Kayton Company), 1045 Grape Street, Whitehall, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal law.

2. C & D Coin & Gun Shop, Inc., 231 East Broad Street, Bethlehem, Pennsylvania, possessed an FFL and was authorized to deal in firearms under federal law.

3. Two Rivers Army and Navy Store, 36 North 3rd Street, Easton, Pennsylvania, possessed an FFL and was authorized to deal in firearms under federal law.

4. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United

States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.

5. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a “Firearms Transaction Record,” ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that she was the actual buyer of the firearm. The Form 4473 contained language warning that “[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for [her]self or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law.”

6. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

7. On or about each of the dates specified in the chart below, in the Eastern District of Pennsylvania, defendant

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knowingly made a false statement and representation with respect to the information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of each of the firearms listed below, from the federally licensed firearms dealers listed below, in that the defendant falsely represented in Department of Treasury Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearms described below, when in fact the defendant knew those representations to be false.

	DATE AND FFL	FIREARM(S) PURCHASED
1	December 18, 2001 Army and Navy Store (Kayton Company), 1045 Grape Street, Whitehall, Pennsylvania	1 Heritage Arms, model C4000(Stealth Shadow), .40 caliber pistol, serial number B04183
2	December 20, 2001 Army and Navy Store (Kayton Company), 1045 Grape Street, Whitehall, Pennsylvania	1 Heritage Arms, model C4000(Stealth Shadow), .40 caliber pistol, serial number B04182
3	January 3, 2002 C & D Coin & Gun Shop, Inc. 231 East Broad Street, Bethlehem, Pennsylvania	1 Jennings, model J9, 9mm pistol, serial number 1483511
4	January 7, 2002 Two Rivers Army & Navy Store 36 N. 3rd St., Easton, Pennsylvania	1 Jennings, model J38N, .380 caliber pistol, serial number 1260719
5	January 9, 2002 C & D Coin & Gun Shop, Inc. 231 East Broad Street, Bethlehem, Pennsylvania	1 Bersa, Thunder 380, .380 caliber pistol, serial number 483740

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

1. As a result of the violation of Title 18, United States Code, Section 924(a)(1)(A), as set forth in Count One of this Information, defendant

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shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C.

§ 2461(c), all firearms involved in the commission of these offenses, including, but not limited to:

- a. Heritage Arms, model C4000(Stealth Shadow), .40 caliber pistol, serial number B04183;
- b. Heritage Arms, model C4000(Stealth Shadow), .40 caliber pistol, serial number B04182;
- c. Jennings, model J9, 9mm pistol, serial number 1483511;
- d. Jennings, model J38N, .380 caliber pistol, serial number 1260719; and
- e. Bersa, Thunder 380, .380 caliber pistol, serial number 483740.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

PATRICK L. MEEHAN
United States Attorney